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July 15, 2015

The Honorable Shira A. Scheindlin  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
50 Pearl Street  
New York, NY

RE: M/V MSC Flaminia  
USDC – SDNY, 12 Civ. 8892(SAS) (and consolidated actions)

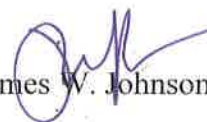
Dear Judge Scheindlin:

We represent Defendant BDP International Inc. (“BDP”) in this matter. BDP filed a Crossclaim against all co-parties in this matter (Docket 616) and all parties to this matter have agreed by way of Stipulation that BDP can withdraw, without prejudice, its Crossclaim (Docket 616) against all co-parties for the reasons set forth in the enclosed Stipulation. Panelpina Inc. filed a Counterclaim against BDP in response to BDP Counterclaim (Docket 642) and has agreed to withdraw that Counterclaim without prejudice.

All parties have agreed to the form of and substance of this Stipulation and I have initialed the Stipulation on behalf of all parties.

We respectfully request that this Stipulation “So Ordered” by the Court and entered on the docket.

Respectfully submitted,

  
James W. Johnson

JWJ:lat  
Enclosure  
cc: All counsel of record (via ECF)